



E. Evans Wohlforth  
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July 8, 2021

**VIA ECF & E-MAIL ([CronanNYSDChambers@nysd.uscourts.gov](mailto:CronanNYSDChambers@nysd.uscourts.gov))**

Hon. John P. Cronan, U.S.D.J.  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

**Re: Valentini v. Group Health Incorporated, et al., No. 1:20-cv-09526**  
**Letter Motion on Consent for Extension of Time**

Your Honor:

This law firm in association with the firm of Post & Post, L.L.C. represent Defendants, CareCore National LLC d/b/a eviCore, the entity named in the Complaint as Group Health Incorporated now formally EmblemHealth Plan, Inc. and Emblem Health, Inc. (collectively "Defendants"), in the above action. On June 29, 2021, Plaintiff filed its Amended Complaint [ECF No. 68] pursuant to the Order of this Court granting Defendant's Motion to Dismiss with leave to file an Amended Complaint as to certain counts. [ECF No. 67 at 31-33]

We write to request an extension of time of thirty days to respond to the Amended Complaint on behalf of Defendants. In the event that response takes the form of a Motion to Dismiss, we further request an extension of thirty days for Plaintiff to respond to that Motion. Plaintiff consents to the relief sought herein.

Without the extension, Defendants' response to the Amended Complaint would be due July 13, 2021, which time has not yet expired. With the extension, Defendants' response would be due August 12, 2021 and Plaintiff's Opposition to a Motion to Dismiss the Amended Complaint would be due September 13, 2021 (the thirtieth day falls on Saturday September 11).

If the foregoing meets with Your Honor's approval, we ask that Your Honor endorse this letter as "So Ordered" and have it entered on the electronic docket of the Clerk of the Court. We thank Your Honor for your kind attention to this request. Please do not hesitate to have the Court's staff contact me with any questions or if we may be of any assistance to the Court whatsoever.

Respectfully submitted,

*s/ E. Evans Wohlforth, Jr.*

E. Evans Wohlforth, Jr.

GIBBONS P.C.

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cc: Steve Cohen, Esq. (via ECF and email)  
Jordan K. Merson, Esq. (via ECF and email)